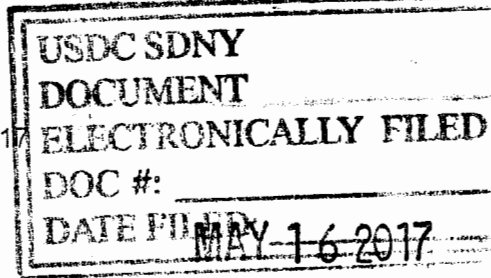


May 15, 2017

BY ECF



NORTON ROSE FULBRIGHT

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The Honorable George B. Daniels
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
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Re: SEC v. Javier Martin-Artajo and Julien G. Grout, Case No. 13-Civ-5677 (GBD) (AJP):
Request for (1) Adjournment of Case Management Conference and (2) Approval of
Proposed Second Amended Civil Case Management Plan and Scheduling Order

Dear Judge Daniels:

We represent Defendant Javier Martin-Artajo in the referenced action. On behalf of all parties, we write to request a brief adjournment of the case management conference scheduled for **June 20, 2017**. The reason for this request is that the parties have scheduled three third-party depositions between June 14 and 23, 2017, two of which will be conducted in Europe. Counsel for the parties could be available on July 11, 12, 13 or 14 for the conference, or another date that is convenient for the Court. This is the first time the parties are seeking to adjourn this conference.

Additionally, the parties jointly submit the enclosed proposed Second Amended Civil Case Management Plan and Scheduling Order for the Court's review and approval. If satisfactory to the Court, it would provide for a 60-day extension of all deadlines that have not yet expired, to accommodate (i) the scheduling of the depositions of several third party witnesses and (ii) subpoenas for the production of documents relating to those witnesses that were recently served.

We thank the Court for its consideration of the parties' requests. Should the Court require additional information, please do not hesitate to contact us.

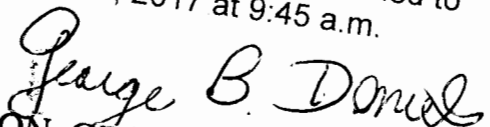
Respectfully yours,


Felice Galant

Enclosure

cc: Via ECF to All Counsel of Record

MAY 16 2017

SO ORDERED
The conference is adjourned to
July 11, 2017 at 9:45 a.m.

HON. GEORGE B. DANIELS